

**Appln No. 09/692,746**

**Amdt date March 29, 2004**

**Reply to Office action of October 27, 2003**

**REMARKS/ARGUMENTS**

Applicant thanks the Examiner for his consideration of the present application. Applicant notes that it has not received an initialed copy of the Information Disclosure Statement filed July 29, 2003. For convenience, Applicant provides herewith a copy of the same. To the extent the Examiner has not already done so, Applicant respectfully requests that the Examiner consider the references cited therein and return a copy of the initialed form 1449 for Applicant's records.

Claims 1-15 and 19-51 are presently pending. Applicant has amended claims 1 and 29 as set forth herein. Applicant is filing a Request for Continued Examination concurrently with this response. Applicant respectfully requests that the Examiner contact Applicant's undersigned counsel to conduct an interview with respect to the claimed subject matter and the cited art, as there appears to be a potential misunderstanding regarding the claimed invention.

In particular, in the October 27, 2003 Office Action, the Examiner appears to have considered the original claims filed in the subject application, as opposed to the claims as amended in Applicant's September 11, 2003 Amendment and response to the first Office Action dated March 11, 2003. By way of example, regarding claim 1, paragraph 3 of the October 27, 2003 Office Action appears identical to paragraph 8 of the March 11, 2003 Office Action even though Applicant amended claim 1 in response to the first Office Action. The Examiner's "Response to Arguments" set forth in Paragraph 35 of the October 27, 2003 Office Action does not appear to address the amendments and

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arguments Applicant made in support of patentability as set forth in the September 11, 2003 response. As such, reexamination and reconsideration of the claims as amended is respectfully requested. Applicant is hopeful that the interview it is requesting may help to focus attention on the distinctions between the claimed invention and the cited art.

The Examiner has rejected claims 1-15 and 19-51 under 35 U.S.C. Section 103(a) as allegedly being unpatentable over Whitehouse, U.S. Patent 6,005,945 in view of Heiden, U.S. Patent 6,408,286. Applicant respectfully requests that the rejection be withdrawn

In one embodiment of Applicants invention, a scalable system is disclosed that includes a plurality of cryptographic devices in which any one or more of the devices may be used to authenticate the digital signature applied to an advertisement on an envelope. As recited in claim 1, for example, the system includes "a plurality of cryptographic devices remote from the plurality of user terminals and coupled to the computer network, wherein the cryptographic devices include a computer executable code for verifying that the advertisement graphics is authorized to be printed next to the VBI, and wherein any one or more of the plurality of cryptographic devices may be used for verifying the advertising graphics." Applicant has further amended the claim to recite that at least a plurality of the cryptomodules are nondedicated and that "any one or more of the plurality of cryptographic devices may be used for verifying the advertising graphics for any one or more of the plurality of user terminals." Neither reference relied upon by the Examiner

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discloses such a nondedicated system. Independent claim 29, recites "verifying the digitally signed advertisement graphics using any of a plurality of cryptographic modules, wherein any of the plurality of cryptographic modules may be used for verifying the digitally signed advertisement graphics for any one or more of the users" Neither of the claimed limitations are disclosed or suggested in the cited references.

In marked contrast to the claimed invention, Whitehouse specifically teaches away from a distributed, nondedicated system including a plurality of cryptographic devices, in which any one or more of a plurality of cryptographic devices may service the needs of any of more of a plurality of user terminals. According to Whitehouse, "[a] key aspect of the system is that all secure processing required for generating postal indicia is performed at secure central computers." As clearly stated by Whitehouse, each secure central computer has its own local memory with its own customer information. As stated by Whitehouse: "The secure central computer 102 at a central site contains all of the customer account information, current balances, a transaction log for each customer, details on each mail piece indicia dispensed, and encryption software and keys." See Whitehouse, Abstract; col. 6, lines 21-30; col. 9, lines 12-20, and FIG 4. Whitehouse, therefore, discloses a system including central computers, in which each central computer is dedicated to particular users based upon whether the central computer holds the information pertaining to that customer's account. It does not disclose a scalable, nondedicated system including a plurality of cryptodevices, any

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of the plurality of which may be used to digitally sign advertising graphics pertaining to any one or more of a plurality of users on the network, as set forth in the claims of the present invention.

The nondedicated nature of the cryptographic devices provides a number of advantages over the system disclosed in Whitehouse. By way of example, in Applicant's system, available cryptomodules may be used to service customers in a flexible and dynamic manner. Where needed, in Applicant's system additional cryptomodules may be added instead of dedicating an entirely new central computer and local memory to each set of users. Accordingly, Applicant's system provides a degree of efficiency and flexibility not realized or contemplated by Whitehouse. Therefore, Applicant respectfully requests that claims 1 and 29 be allowed.

The remaining claims 2-15, 19-28 and 30-51 depend directly or indirectly on independent claims 1 and 29, and are therefore are also in condition for allowance.

Applicant again thanks the Examiner for his careful consideration of this application and requests that he contact Applicant's undersigned counsel to schedule an interview.

Respectfully submitted,  
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